

STATE OF COLORADO

COLORADO DEPARTMENT OF PUBLIC HEALTH AND ENVIRONMENT
AIR POLLUTION CONTROL DIVISION
TELEPHONE: (303) 692-3150



CONSTRUCTION PERMIT

PERMIT NO: **09EP1103**

DATE ISSUED: **APR 11 2013**

Final Approval

ISSUED TO: **Hewlett-Packard**

THE SOURCE TO WHICH THIS PERMIT APPLIES IS DESCRIBED AND LOCATED AS FOLLOWS:

Emergency generator, located at 311 Rockrimmon Boulevard, Building CXC01, Colorado Springs in El Paso County, Colorado.

THE SPECIFIC EQUIPMENT OR ACTIVITY SUBJECT TO THIS PERMIT INCLUDES THE FOLLOWING:

AIRS Point	Equipment ID	Serial Number	Description
012	CXCO1 GEN#01	D080172102	Diesel fueled engines powering electrical generators Cummins, Model: QSK60-G6 NR2
	CXCO1 GEN#02	D080172103	
	CXCO1 GEN#03	B080159858	Design rated at 2,922 BHP at sea level, 2,919 BHP at site Equipped with turbochargers
	CXCO1 GEN#04	B08060280	
	CXCO1 GEN#05	C080162929	5.0 L/cyl Manufacture dates from 2008-2009, 9/24/2009 date of entry into Colorado
	CXCO1 GEN#06	C080165455	
	CXCO1 GEN#07	J080212807	This engine is subject to NSPS IIII Tier 2 Standards
	CXCO1 GEN#08	J080217441	

This engine may be replaced with another engine in accordance with the temporary engine replacement provision or with another Cummins Model QSK60-NR2 engine in accordance with the permanent replacement provision of the Alternate Operating Scenario (AOS), included in this permit as Attachment A.

THIS PERMIT IS GRANTED SUBJECT TO ALL RULES AND REGULATIONS OF THE COLORADO AIR QUALITY CONTROL COMMISSION AND THE COLORADO AIR POLLUTION PREVENTION AND CONTROL ACT C.R.S. (25-7-101 et seq), TO THOSE GENERAL TERMS AND CONDITIONS INCLUDED IN THIS DOCUMENT AND THE FOLLOWING SPECIFIC TERMS AND CONDITIONS:

EMISSION LIMITATIONS AND RECORDS

1. Emissions of air pollutants shall not exceed the following limitations (as calculated using the emission factors included in the Notes to Permit Holder section of this permit). Annual records of the actual emission rates shall be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation No. 3, Part B, Section II.A.4)

Annual Limits:

AIRS Point	Tons per Year						Emission Type
	PM	PM ₁₀	PM _{2.5}	NO _x	VOC	CO	
012	0.9	0.9	0.9	13.2	0.9	1.7	Point

Emissions of air pollutants on an annual basis shall be found using the following formula:

$$Emissions_{Annual} = \frac{[Emission\ Factor\ (lb/hr) * Hours\ of\ Operation(hr/yr)]}{(2000lb/1\ ton)}$$

Emission factors used to calculate limits shall be those found in "Notes to Permit Holder #3".

Compliance with the annual limits shall be determined by recording the facility's annual emissions for the pollutants listed in the table above and all HAPs above the de-minimis reporting level on a rolling (12) month total. By the end of each month a new twelve-month total shall be calculated based on the previous twelve months' data. The permit holder shall calculate monthly emissions and keep a compliance record on site, or at a local field office with site responsibility, for Division review. This rolling twelve-month total shall apply to all emission units, requiring an APEN, at this facility.

PROCESS LIMITATIONS AND RECORDS

2. This source shall be limited to the following maximum consumption, processing and/or operational rates as listed below. Annual and hourly records of the actual process rate shall be maintained by the applicant and made available to the Division for inspection upon request. (Reference: Regulation 3, Part B, II.A.4)

Process/Consumption Limits

AIRS Point	Process Parameter	Annual Limit
012	Hours of Operation per engine	100 hr/yr

Compliance with these consumption limits will be demonstrated by installing a non-resettable hour meter on the engine and recording the hours of the engine's operation.

Compliance with the yearly process limits shall be determined on a rolling twelve (12) month total. By the end of each month a new twelve-month total is calculated based on the previous twelve months' data. The permit holder shall calculate monthly process rate and keep a compliance record on site or at a local field office with site responsibility, for Division review.

STATE AND FEDERAL REGULATORY REQUIREMENTS

3. Visible emissions shall not exceed twenty percent (20%) opacity during normal operation of the source. During periods of startup, process modification, or adjustment of control equipment

visible emissions shall not exceed 30% opacity for more than six minutes in any sixty consecutive minutes. Opacity shall be determined using EPA Method 9. (Reference: Regulation No. 1, Section II.A.1. & 4.)

4. This source is subject to the odor requirements of Regulation No. 2. (State only enforceable)
5. When relocating this equipment the owner or operator shall (Reference: Regulation No. 3, Part A, Section II.C.1.f and Part B, Section III.E.):
 - a. Submit a Relocation Notice each time this equipment is moved to a new location. The Relocation Notice shall be received by the Division at least ten (10) days prior to the change in location.

The Relocation Notice shall include a facility emission inventory that includes all emission units at the new location. An ambient air quality impact analysis for the site shall be submitted with the Relocation Notice for this equipment if so requested by the Division.
 - b. Maintain records of compliance with all additional requirements that are triggered by the relocation. Such requirements may include, but are not limited to:
 - (1) State or Federal New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), Maximum Achievable Control Technology (MACT), and Generally Available Control Technology (GACT) requirements; and
 - (2) Major source requirements, including Title V Operating Permit, Nonattainment Area New Source Review (NANSR) and Prevention of Significant Deterioration (PSD) program requirements; and
 - (3) Permitting requirements for sources no longer permit exempt due to the relocation of this unit to the site (i.e. previously Air Pollutant Emission Notice (APEN) required, permit exempt sources).
 - c. Keep a record of all relocation notices submitted to the Division.
6. This source is subject to the New Source Performance Standards requirements of Regulation No. 6, Part A, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) including, but not limited to, the following:
 - a. Emissions of Non-Methane Hydrocarbons and Nitrogen Oxides combined shall not exceed 4.8 grams per horsepower hour.
 - b. Emissions of Carbon Monoxide shall not exceed 2.6 grams per horsepower hour.
 - c. Emissions of Particulate Matter shall not exceed 0.15 grams per horsepower hour.
 - d. All fuel purchased shall meet the following specifications:
 - (1) Sulfur content shall not exceed 15 ppm.
 - (2) Have a minimum cetane index of 40 or

Have a maximum aromatic compound content of 35% by volume.

Compliance shall be demonstrated by maintaining copies of the fuel specifications provided by the supplier on-site or in a readily accessible location and made available to the Division for inspection upon request.

- e. All engines and control devices must be installed, configured, operated, and maintained according to the specifications and instructions provided by the engine manufacturer.
 - f. If engine is equipped with a diesel particulate filter, the filter must be installed with a backpressure monitor that notifies the owner or operator when the high backpressure limit of the engine is approached. Records shall be kept of any corrective action taken after the backpressure monitor has notified the owner or operator that the high backpressure limit is approached.
 - g. If engine is used for emergency purposes, a non-resettable hour meter must be installed prior to start-up. (Reference: NSPS IIII, § 60.4209 (a))
7. The following requirements of Regulation No. 6, Part A, Subpart A, General Provisions, apply.
- a. At all times, including periods of start-up, shutdown, and malfunction, the facility and control equipment shall, to the extent practicable, be maintained and operated in a manner consistent with good air pollution control practices for minimizing emissions. Determination of whether or not acceptable operating and maintenance procedures are being used will be based on information available to the Division, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. (Reference: Regulation No. 6, Part A. General Provisions from 40 CFR 60.11
 - b. No article, machine, equipment or process shall be used to conceal an emission which would otherwise constitute a violation of an applicable standard. Such concealment includes, but is not limited to, the use of gaseous diluents to achieve compliance with an opacity standard or with a standard which is based on the concentration of a pollutant in the gases discharged to the atmosphere. (§ 60.12)
 - c. Written notification of construction and initial startup dates shall be submitted to the Division as required under § 60.7.
 - d. Records of startups, shutdowns, and malfunctions shall be maintained, as required under § 60.7.

OPERATING & MAINTENANCE REQUIREMENTS

8. The owner or operator shall follow the most current operating and maintenance (O&M) plan and recordkeeping format approved by the Division in order to demonstrate compliance on an ongoing basis with the requirements of this permit. Revisions to the O&M plan are subject to Division approval prior to implementation. (Reference: Regulation No. 3, Part B, Section III.G.7.).

COMPLIANCE TESTING AND SAMPLING

Periodic Testing Requirements

9. Replacements of this unit completed as Alternative Operating Scenarios may be subject to additional testing requirements as specified in Attachment A.

ADDITIONAL REQUIREMENTS

10. All previous versions of this permit are cancelled upon issuance of this permit.
11. The permit number shall be marked on the subject equipment for ease of identification. (Reference: Regulation No. 3, Part B, III.E.) (State only enforceable)
12. A revised Air Pollutant Emission Notice (APEN) shall be filed: (Reference: Regulation No. 3, Part A, II.C)

- a. Annually whenever a significant increase in emissions occurs as follows:

For any criteria pollutant:

For sources emitting **less than 100 tons per year of a criteria pollutant**, a change in annual actual emissions of five (5) tons per year or more, above the level reported on the last APEN; or

For volatile organic compounds (VOC) and nitrogen oxides sources (NO_x) in ozone nonattainment areas emitting **less than one hundred tons of VOC or NO_x per year**, a change in annual actual emissions of one (1) ton per year or more or five percent, whichever is greater, above the level reported on the last APEN; or

For sources emitting **100 tons per year or more of a criteria pollutant**, a change in annual actual emissions of five percent or fifty (50) tons per year or more, whichever is less, above the level reported on the last APEN submitted; or

For sources emitting **any amount of lead**, a change in actual emissions of fifty (50) pounds of lead above the level reported on the last APEN submitted.

For any non-criteria reportable pollutant:

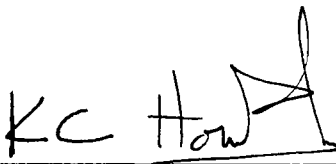
If the emissions increase by 50% or five (5) tons per year, whichever is less, above the level reported on the last APEN submitted to the Division.

- b. Whenever there is a change in the owner or operator of any facility, process, or activity; or
 - c. Whenever new control equipment is installed, or whenever a different type of control equipment replaces an existing type of control equipment; or
 - d. Whenever a permit limitation must be modified; or
 - e. No later than 30 days before the existing APEN expires.
13. Operating Permit (OP) requirements shall apply to this source at any such time that the facility wide potential to emit equals or exceeds the major source level. Once the facility wide potential to emit equals or exceeds the major source level a Title V operating permit application shall be submitted in accordance with the requirements in Regulation No. 3, Part C.

GENERAL TERMS AND CONDITIONS:

14. This permit and any attachments must be retained and made available for inspection upon request. The permit may be reissued to a new owner by the Division as provided in Regulation No. 3, Part B, Section II.B upon a request for transfer of ownership and the submittal of a revised APEN and the required fee.
15. If this permit specifically states that final approval has been granted, then the remainder of this condition is not applicable. Otherwise, the issuance of this construction permit does not provide "final" authority for this activity or operation of this source. Final approval of the permit must be secured from the Division in writing in accordance with the provisions of 25-7-114.5(12)(a) C.R.S. and Regulation No. 3, Part B, Section III.G. Final approval cannot be granted until the operation or activity commences and has been verified by the Division as conforming in all respects with the conditions of the permit. Once self-certification of all points has been reviewed and approved by the Division, it will provide written documentation of such final approval. **Details for obtaining final approval to operate are located in the Requirements to Self-Certify for Final Approval section of this permit.**
16. This permit is issued in reliance upon the accuracy and completeness of information supplied by the applicant and is conditioned upon conduct of the activity, or construction, installation and operation of the source, in accordance with this information and with representations made by the applicant or applicant's agents. It is valid only for the equipment and operations or activity specifically identified on the permit.
17. Unless specifically stated otherwise, the general and specific conditions contained in this permit have been determined by the Division to be necessary to assure compliance with the provisions of Section 25-7-114.5(7)(a), C.R.S.
18. Each and every condition of this permit is a material part hereof and is not severable. Any challenge to or appeal of a condition hereof shall constitute a rejection of the entire permit and upon such occurrence, this permit shall be deemed denied *ab initio*. This permit may be revoked at any time prior to self-certification and final authorization by the Division on grounds set forth in the Colorado Air Pollution Prevention and Control Act and regulations of the AQCC including failure to meet any express term or condition of the permit. If the Division denies a permit, conditions imposed upon a permit are contested by the applicant, or if the Division revokes a permit, the applicant or owner or operator of a source may request a hearing before the AQCC for review of the Division's action.
19. Section 25-7-114.7(2)(a), C.R.S. requires that all sources required to file an Air Pollution Emission Notice (APEN) must **pay an annual fee** to cover the costs of inspections and administration. If a source or activity is to be discontinued, the owner must notify the Division in writing requesting a cancellation of the permit. Upon notification, annual fee billing will terminate.
20. Violation of the terms of a permit or of the provisions of the Colorado Air Pollution Prevention and Control Act or the regulations of the AQCC may result in administrative, civil and/or criminal enforcement actions under Sections 25-7-115 (enforcement), -121 (injunctions), -122 (civil penalties), -122.1 (criminal penalties), C.R.S.

By:



K.C. Houlden
Permit Engineer

Permit History

Issuance	Date	Description
Initial Approval	November 19, 2009	Issued to Hewlett-Packard
Final Approval	This Issuance	Removed self certification requirements. Changed throughput from fuel based to hours of operation based per source request. Source is indefinitely postponing the addition of 8 more generators to site. Source decided to keep synthetic minor status for possibility of adding generators in the future. Emission limits in permit reduced to represent the 8 engines installed.

Notes to Permit Holder (as of date of permit issuance):

- 1) The production or raw material processing limits and emission limits contained in this permit are based on the consumption rates requested in the permit application. These limits may be revised upon request of the permittee providing there is no exceedance of any specific emission control regulation or any ambient air quality standard. A revised air pollution emission notice (APEN) and application form must be submitted with a request for a permit revision.
- 2) This source is subject to the Common Provisions Regulation Part II, Subpart E, Affirmative Defense Provision for Excess Emissions During Malfunctions. The permittee shall notify the Division of any malfunction condition which causes a violation of any emission limit or limits stated in this permit as soon as possible, but no later than noon of the next working day, followed by written notice to the Division addressing all of the criteria set forth in Part II.E.1. of the Common Provisions Regulation. See: <http://www.cdphe.state.co.us/regulations/airregs/5CCR1001-2.pdf>.

- 3) The emission levels contained in this permit are based on the following emission factors:

Point 012:

Pollutant	Emission Factors - Uncontrolled		Emission Factors - Controlled*	
	lb/hr	Source	lb/hr	Source
NO _x	32.9181	Mfr	32.9181	Mfr
CO	4.18724	Mfr	4.18724	Mfr
VOC	2.06	Mfr	2.06	Mfr
PM, PM10, PM2.5	2.04543	Mfr	2.04543	Mfr

- 4) In accordance with C.R.S. 25-7-114.1, each Air Pollutant Emission Notice (APEN) associated with this permit is valid for a term of five years from the date it was received by the Division. A revised APEN shall be submitted no later than 30 days before the five-year term expires. Please refer to the most recent annual fee invoice to determine the APEN expiration date for each emissions point associated with this permit. For any questions regarding a specific expiration date call the Division at (303)-692-3150.

- 5) This facility is classified as follows:

Applicable Requirement	Status
Operating Permit	Synthetic Minor Source for NO _x
NANSR	Minor Source
PSD	Minor Source

- 6) This engine is subject to 40 CFR, Part 63, Subpart ZZZZ - **National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (Federally enforceable only)**. A copy of the complete subpart is available on the EPA website at: <http://www.epa.gov/ttn/atw/rice/ricepg.html>. All initial notifications, compliance demonstrations, and required documentation should be submitted directly to U.S. EPA Region 8 and copies sent to the Colorado Air Pollution Control Division
- 7) Full text of the Title 40, Protection of Environment Electronic Code of Federal Regulations can be found at the website listed below:

<http://ecfr.gpoaccess.gov/>

Part 60: Standards of Performance for New Stationary Sources		
NSPS	60.4200-60.4219	Subpart IIII
Part 63: National Emission Standards for Hazardous Air Pollutants for Source Categories		
MACT	63.6580-63.6675	Subpart ZZZZ

- 8) Certification documentation of compliance with the NSPS IIII emission standards was received with the initial application.

ATTACHMENT A: ALTERNATIVE OPERATING SCENARIOS STATIONARY (CI) ENGINE

October 1, 2011

2. Alternative Operating Scenarios

The following Alternative Operating Scenario (AOS) for the temporary and permanent replacement of Stationary (CI) engines has been reviewed in accordance with the requirements of Regulation No. 3., Part A, Section IV.A, Operational Flexibility- Alternative Operating Scenarios, Regulation No. 3, Part B, Construction Permits, and Regulation No. 3, Part D, Major Stationary Source New Source Review and Prevention of Significant Deterioration, and it has been found to meet all applicable substantive and procedural requirements. This permit incorporates and shall be considered a Construction Permit for any engine replacement performed in accordance with this AOS, and the owner or operator shall be allowed to perform such engine replacement without applying for a revision to this permit or obtaining a new Construction Permit.

2.1 Engine Replacement

The following AOS is incorporated into this permit in order to deal with an engine breakdown or periodic routine maintenance and repair of an existing onsite engine that requires the use of either a temporary or permanent replacement engine. "Temporary" is defined as in the same service for 90 operating days or less in any 12 month period. "Permanent" is defined as in the same service for more than 90 operating days in any 12 month period. The 90 days is the total number of days that the engine is in operation. If the engine operates only part of a day, that day shall count as a single day towards the 90-day total. The compliance demonstrations and any periodic monitoring required by this AOS are in addition to any compliance demonstrations or periodic monitoring required by this permit.

All replacement engines are subject to all federally applicable and state-only requirements set forth in this permit (including monitoring and record keeping).

The results of any all tests and the associated calculations required by this AOS shall be submitted to the Division within 60 days. Results of all tests shall be kept on site for five (5) years and made available to the Division upon request.

The owner or operator shall maintain a log on-site and contemporaneously record the start and stop date of any engine replacement, the manufacturer, date of manufacture, model number, horsepower, and serial number of the engine(s) that are replaced during the term of this permit, and the manufacturer, model number, horsepower, and serial number of the replacement engine.

2.1.1 The owner or operator may **temporarily** replace an existing engine that is covered by this permit with a different engine without modifying this permit, so long as the temporary replacement engine complies with all permit limitations and other requirements applicable to the existing engine. Calculation of emissions from the temporary replacement engine shall be made as set forth in section 2.1.3.

2.1.2 An Air Pollutant Emissions Notice (APEN) that includes the specific manufacturer, model and serial number and horsepower of the permanent

replacement engine shall be filed with the Division for the permanent replacement engine within 14 calendar days of commencing operation of the replacement engine. The APEN shall be accompanied by the appropriate APEN filing fee, a cover letter explaining that the owner or operator is exercising an alternative operating scenario and is installing a permanent replacement engine and an analysis of any new applicable requirements for the replacement engine as required by Condition 2.2. This submittal shall be accompanied by a certification from the Responsible Official indicating that "based on the information and belief formed after reasonable inquiry, the statements and information included in the submittal are true, accurate and complete".

This AOS cannot be used for permanent engine replacement of a grandfathered or permit exempt engine or an engine that is not subject to emission limits.

The owner or operator shall agree to pay fees based on the normal permit processing rate for review of information submitted to the Division in regard to any permanent engine replacement.

2.1.3 Compliance of the replacement engine with the applicable emission limitations of the original engine shall be monitored by one of the following methods:

- 1) Manufacturer certified emission factors showing compliance.
- 2) Stack tests of same make and model showing compliance. This would only be considered if the test was done under similar conditions to Colorado (i.e. at altitude).
- 3) Stack tests on the engine.

2.2 Applicable Regulations for Permanent Engine Replacements

2.2.1 NSPS for stationary compression ignition internal combustion engines: 40 CFR Part 60, Subpart IIII.

A permanent replacement engine that is ordered after July 11, 2005 and manufactured after April 1, 2006 or is modified or reconstructed after July 11, 2005 is subject to the requirements of 40 CFR Part 60, Subpart IIII. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement shall be included in any request for a permanent engine replacement.

Note that under the provisions of Regulation No. 6, Part B, section I.B. that Relocation of a source from outside of the State of Colorado into the State of Colorado is considered to be a new source, subject to the requirements of Regulation No. 6 (i.e., the date that the source is first relocated to Colorado becomes equivalent to the date of manufacture for purposes of determining the applicability of NSPS IIII requirements).

2.2.2. MACT for Stationary Reciprocating Internal Combustion Engines: 40 CFR Part 63, Subpart ZZZZ.

Any permanent replacement engine located at either an area or major source is subject to the requirements of 40 CFR Part 63, Subpart ZZZZ. An analysis of applicable monitoring, recordkeeping, and reporting requirements for the permanent engine replacement shall be included in any request for a permanent

engine replacement.

2.3 Additional Sources

The replacement of an existing engine with a new engine is viewed by the Division as the installation of a new emissions unit, not "routine replacement" of an existing unit. The AOS is therefore essentially an advanced construction permit review. The AOS cannot be used for additional new emission points for any site; an engine that is being installed as an entirely new emission point and not as part of an AOS-approved replacement of an existing onsite engine has to go through the appropriate Construction/Operating permitting process prior to installation.